

EXHIBIT D

TN CONF OF THE NATL ASSOC FOR THE ADVANCEMENT OF COLORED PEOPLE

VS

LEE, et al.

REGINALD HENDRIX

May 16, 2023



Deborah H. Honeycutt, LCR

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1 UNITED STATES DISTRICT COURT
2 MIDDLE DISTRICT OF TENNESSEE
3 NASHVILLE DIVISION

4 TENNESSEE CONFERENCE OF THE
5 NATIONAL ASSOCIATION FOR THE
6 ADVANCEMENT OF COLORED PEOPLE,
7 et al.,

8	Plaintiffs,	Case No. 3:20-cv-01039
9		Judge Campbell
10	vs.	Magistrate Judge
11		Frensley
12	WILLIAM LEE, et al.,	Class Action
13	Defendants.	

14 Volume 1

15 Videoconference Deposition of:

16 REGINALD HENDRIX

17 Taken on behalf of the Defendants
18 May 16, 2023

19 Commencing at 1:03 p.m.

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1 short break? Is that okay?

2 MS. HULING: Yes. So we'll be back on
3 at 2:20.

4 (Recess observed.)

5 BY MR. VARELA:

6 Q. Mr. Hendrix, just a few more questions.
7 Thank you for your patience. I know this is not the
8 most fun thing in the whole world. Question to you.

9 Now that you've had your voting right
10 restored, I think your complaint said that it
11 happened in May of 2022; is that correct?

12 A. Correct.

13 Q. Is that not correct?

14 MS. HULING: That's not correct. That's
15 not what the complaint says.

16 MR. VARELA: Never guess. Always
17 verify, right?

18 BY MR. VARELA:

19 Q. I'm sorry. That's when your first attempt
20 was denied because there were additional criminal
21 felony convictions that were not on the COR; is that
22 right?

23 A. Correct.

24 Q. After that, you received CORs from Davidson
25 County, submitted those to the elections division,

1 and then you were approved; is that correct?

2 A. Correct.

3 Q. How were you informed that you were approved
4 to have your voting right restored?

5 A. The election commission contacted me.

6 Q. By phone, by email, by letter?

7 A. By phone.

8 MR. VARELA: By phone, okay. And so,
9 Alice, what you're saying is that a letter has not
10 yet been sent from the election commission
11 confirming that Mr. Hendrix has his rights restored?

12 MS. HULING: That the elections division
13 has all of them for the State and so should also
14 have Mr. Hendrix and they produced the denials and
15 approvals up to a certain date but his approval came
16 after that date and we've not gotten a supplement
17 that included that.

18 MR. VARELA: Got you. And if you don't
19 mind, just putting that in an email specifically,
20 about whatever date supplement went through, we'll
21 work on getting that.

22 BY MR. VARELA:

23 Q. Mr. Hendrix, last question. Do you have your
24 voter registration card.

25 A. Yes, I do.

1 MR. VARELA: Congratulations. I have no
2 further questions.

3 MS. HULING: I do have a few questions.
4 Mr. Hendrix, I'm sure you were hoping that that was
5 it, but just a few more and I promise to be brief.

6
7 EXAMINATION

8 QUESTIONS BY MS. HULING:

9 Q. When you were speaking with Mr. Varela -- am
10 I saying that correctly?

11 MR. VARELA: That's right.

12 BY MS. HULING:

13 Q. When you were speaking with Mr. Varela, I
14 believe you said that someone helped you in the
15 process of getting the completed CORs and submitting
16 them?

17 A. Correct.

18 Q. Okay. And when Mr. Varela said that you
19 submitted something to your elections office, was
20 that you personally or with the help of the
21 volunteer who you were working with?

22 A. The help of the volunteer. I was kind of
23 confused a little bit.

24 Q. Absolutely. Not a problem. We all use
25 shorthand sometimes. Okay.